

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**[PROPOSED] ORDER**

This matter having come before the Court on Mr. Rafiekian's Motion for Leave to File Under Seal a reply to the government's response to Mr. Rafiekian's July 5th memorandum addressing the government's July 3, 2019 *ex parte* motion pursuant to Local Criminal Rule 49(D) and for good cause shown, the Court finds:

1. Mr. Rafiekian seeks to file under seal a reply to the government's response to Mr. Rafiekian's July 8th memorandum responding to the government's *ex parte* motion.

2. Sealing is appropriate when necessary to protect private interests and to ensure that court records are not used to promote public scandal. *See In re Knight Pub. Co.*, 743 F.2d 231, 236 (4<sup>th</sup> Cir. 1984); *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978). The Court concludes that the documents at issue meet those standards.

3. The Court has considered procedures other than sealing, but none would sufficiently protect the information subject to sealing.

4. The Court has inherent power to seal materials. *See In re Knight Pub. Co.*, 743 F.2d at 235; *Am. Civil Liberties Union v. Holder*, 673 F.3d 245, 255–56 (4th Cir. 2011).

5. Mr. Rafiekian seeks to have the material filed under seal pursuant to this Order until further order of the Court.

NOW THEREFORE,

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that the documents shall remain sealed until further order of the Court.

**SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Anthony J. Trenga  
United States District Judge